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12 **UNITED STATES DISTRICT COURT**  
13 **SOUTHERN DISTRICT OF CALIFORNIA**

Nicholas Guilak  Plaintiff,  v.  Sentry Credit, Inc.  Defendant.	<b>Case No: '11CV2071 IEG CAB</b>  <b>Complaint For Damages</b>  <b>Jury Trial Demanded</b>
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22 **INTRODUCTION**

- 23 1. The United States Congress has found abundant evidence of the use of  
24 abusive, deceptive, and unfair debt collection practices by many debt  
25 collectors, and has determined that abusive debt collection practices  
contribute to the number of personal bankruptcies, to marital instability, to the  
26 loss of jobs, and to invasions of individual privacy. Congress wrote the Fair  
27 Debt Collection Practices Act, 15 U.S.C. § 1692 et seq. (hereinafter  
28

1       “FDCPA”), to eliminate abusive debt collection practices by debt collectors,  
2       to insure that those debt collectors who refrain from using abusive debt  
3       collection practices are not competitively disadvantaged, and to promote  
4       consistent State action to protect consumers against debt collection abuses.

- 5       2. The California legislature has determined that the banking and credit system  
6       and grantors of credit to consumers are dependent upon the collection of just  
7       and owing debts and that unfair or deceptive collection practices undermine  
8       the public confidence that is essential to the continued functioning of the  
9       banking and credit system and sound extensions of credit to consumers. The  
10      Legislature has further determined that there is a need to ensure that debt  
11      collectors exercise this responsibility with fairness, honesty and due regard  
12      for the debtor’s rights and that debt collectors must be prohibited from  
13      engaging in unfair or deceptive acts or practices.
- 14      3. Nicholas Guilak, (Plaintiff), through Plaintiff’s attorneys, brings this action to  
15      challenge the actions of Sentry Credit, Inc., (“Defendant”), with regard to  
16      attempts by Defendant to unlawfully and abusively collect a debt allegedly  
17      owed by Plaintiff, and this conduct caused Plaintiff damages.
- 18      4. Plaintiff makes these allegations on information and belief, with the exception  
19      of those allegations that pertain to a plaintiff, or to a plaintiff’s counsel, which  
20      Plaintiff alleges on personal knowledge.
- 21      5. While many violations are described below with specificity, this Complaint  
22      alleges violations of the statutes cited in their entirety.
- 23      6. Unless otherwise stated, all the conduct engaged in by Defendant took place  
24      in California.
- 25      7. Any violations by Defendant were knowing, willful, and intentional, and  
26      Defendant did not maintain procedures reasonably adapted to avoid any such  
27      violation.

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## **JURISDICTION AND VENUE**

- 2 8. Jurisdiction of this Court arises pursuant to 28 U.S.C. § 1331, 15 U.S.C. §  
3 1692(k), and 28 U.S.C. § 1367 for supplemental state claims.

4 9. This action arises out of Defendant's violations of the Fair Debt Collection  
5 Practices Act, 15 U.S.C. §§ 1692 et seq. ("FDCPA") and the Rosenthal Fair  
6 Debt Collection Practices Act, California Civil Code §§ 1788-1788.32  
7 ("Rosenthal Act").

8 10. Because Defendant does business within the State of California, personal  
9 jurisdiction is established.

10 11. Venue is proper pursuant to 28 U.S.C. § 1391.

11 12. At all times relevant, Defendant conducted business within the State of  
12 California.

## PARTIES

14. Plaintiff is a natural person who resides in the City of Los Angeles, State of  
15. California.

16. Defendant is located in the City of Everett, in the State of Washington.

17. Plaintiff is obligated or allegedly obligated to pay a debt, and is a “consumer”  
18. as that term is defined by 15 U.S.C. § 1692a(3).

19. Defendant is a person who uses an instrumentality of interstate commerce or  
20. the mails in a business the principal purpose of which is the collection of  
21. debts, or who regularly collects or attempts to collect, directly or indirectly,  
22. debts owed or due or asserted to be owed or due another and is therefore a  
23. debt collector as that phrase is defined by 15 U.S.C. § 1692a(6).

24. Plaintiff is a natural person from whom a debt collector sought to collect a  
25. consumer debt which was due and owing or alleged to be due and owing from  
26. Plaintiff, and is a “debtor” as that term is defined by California Civil Code §  
27. 1788.2(h).

## FACTUAL ALLEGATIONS

10     20. Sometime before September 7, 2010, Plaintiff is alleged to have incurred  
11       certain financial obligations.

12    21. These financial obligations were primarily for personal, family or household  
13        purposes and are therefore a “debt” as that term is defined by 15 U.S.C.  
14        §1692a(5).

15       22. These alleged obligations were money, property, or their equivalent, which is  
16           due or owing, or alleged to be due or owing, from a natural person to another  
17           person and are therefore a “debt” as that term is defined by California Civil  
18           Code §1788.2(d), and a “consumer debt” as that term is defined by California  
19           Civil Code §1788.2(f).

20     23. Sometime thereafter, but before September 7, 2010, Plaintiff allegedly fell  
21     behind in the payments allegedly owed on the alleged debt. Plaintiff currently  
22     takes no position as to the validity of this alleged debt.

25     25. On or about September 7, 2010, Defendant mailed a dunning letter to  
26     Plaintiff. A few days later, Plaintiff received that letter.

- 1       26. This communication to Plaintiff was a “communication” as that term is
- 2           defined by 15 U.S.C. § 1692a(2), and an “initial communication” consistent
- 3           with 15 U.S.C. § 1692g(a).
- 4       27. This communication was a “debt collection” as Cal. Civ. Code 1788.2(b)
- 5           defines that phrase, and an “initial communication” consistent with Cal. Civ.
- 6           Code § 1812.700(b).
- 7       28. Defendant failed within five days after its initial communication with
- 8           Plaintiff, to provide written notification containing a statement that unless
- 9           Plaintiff, within thirty days after receipt of that notice, disputed the validity of
- 10          the debt, or any portion thereof, Defendant would assume the debt was valid,
- 11          or failed within five days after its initial communication with Plaintiff to
- 12          provide a written notice containing a statement that if Plaintiff notified
- 13          Defendant in writing, within the thirty-day period that the debt, or any portion
- 14          thereof, was disputed, Defendant would obtain verification of the debt or a
- 15          copy of a judgment against Plaintiff and a copy of such verification or
- 16          judgment would be mailed to Plaintiff by Defendant and that Defendant
- 17          would provide Plaintiff with the name and address of the original creditor.
- 18          This omission by Defendant violated 15 U.S.C. § 1692g.
- 19       29. Because this omission violated the language in 15 U.S.C. § 1692g, Defendant
- 20          also violated Cal. Civ. Code § 1788.17 as it incorporates 15 U.S.C. § 1692g.
- 21       30. This initial communication to Plaintiff by Defendant included a written
- 22          notice, the language of which overshadowed, weakened, and failed to comply
- 23          with, the notice required by 15 U.S.C. § 1692g(a), as well as Cal. Civ. Code
- 24          1788.17 as it incorporates 15 U.S.C. § 1692g(a), because it attempted to limit
- 25          the rights available to Plaintiff in a manner that creates a contradiction would
- 26          confuse the least sophisticated consumer into disregarding his or her rights
- 27          pursuant to the validation notice required in 15 U.S.C. § 1692g by stating that

in order to take advantage of a settlement offer, Plaintiff was required to respond and pay the debt in less than thirty-days.

## **CAUSES OF ACTION**

## COUNT I

## **FAIR DEBT COLLECTION PRACTICES ACT (FDCPA)**

15 U.S.C. §§ 1692 ET SEQ.

31. Plaintiff repeats, re-alleges, and incorporates by reference, all other paragraphs.
  32. The foregoing acts and omissions constitute numerous and multiple violations of the FDCPA, including but not limited to each and every one of the above-cited provisions of the FDCPA, 15 U.S.C. § 1692 et seq.
  33. As a result of each and every violation of the FDCPA, Plaintiff is entitled to any actual damages pursuant to 15 U.S.C. § 1692k(a)(1); statutory damages in an amount up to \$1,000.00 pursuant to 15 U.S.C. § 1692k(a)(2)(A); and, reasonable attorney's fees and costs pursuant to 15 U.S.C. § 1692k(a)(3) from Defendant.

## COUNT II

## **ROSENTHAL FAIR DEBT COLLECTION PRACTICES ACT (ROSENTHAL ACT)**

**CAL. CIV. CODE §§ 1788-1788.32**

34. Plaintiff repeats, re-alleges, and incorporates by reference, all other paragraphs.
  35. The foregoing acts and omissions constitute numerous and multiple violations of the Rosenthal Act, including but not limited to each and every one of the above-cited provisions of the Rosenthal Act, Cal. Civ. Code §§ 1788-1788.32
  36. As a result of each and every violation of the Rosenthal Act, Plaintiff is entitled to any actual damages pursuant to Cal. Civ. Code § 1788.30(a); statutory damages for a knowing or willful violation in the amount up to

1 \$1,000.00 pursuant to Cal. Civ. Code § 1788.30(b); and reasonable attorney's  
2 fees and costs pursuant to Cal. Civ. Code § 1788.30(c) from Defendant.

3 **PRAYER FOR RELIEF**

4 WHEREFORE, Plaintiff prays that judgment be entered against Defendant, and  
5 Plaintiff be awarded damages from Defendant, as follows:

- 6 • An award of statutory damages of \$1,000.00 pursuant to 15 U.S.C. §  
7 1692k(a)(2)(A);  
8 • An award of costs of litigation and reasonable attorney's fees, pursuant  
9 to 15 U.S.C. § 1692k(a)(3);  
10 • An award of statutory damages of \$1,000.00 pursuant to Cal. Civ. Code  
11 § 1788.30(b);  
12 • An award of costs of litigation and reasonable attorney's fees, pursuant  
13 to Cal. Civ. Code § 1788.30(c).

14 37. Pursuant to the seventh amendment to the Constitution of the United States of  
15 America, Plaintiff is entitled to, and demands, a trial by jury.

16  
17 Respectfully submitted,

18 **Kazerouni Law Group**

19  
20 Date: September 7, 2011

By: /s/ Abbas Kazerounian  
21 Abbas Kazerounian  
22 Attorneys for Plaintiff

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## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

**I. (a) PLAINTIFFS**

Nicholas Guilak

(b) County of Residence of First Listed Plaintiff \_\_\_\_\_  
 (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)

Kazerouni Law Group  
 2700 North Main Street, Suite 1050

**DEFENDANTS**

Sentry Credit, Inc.

County of Residence of First Listed Defendant Everett, WA

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE  
 LAND INVOLVED.

Attorneys (If Known)

**'11CV2071 IEG CAB****II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- |  |   |
|--|---|
| <input type="checkbox"/> 1 U.S. Government Plaintiff | <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)  |
| <input type="checkbox"/> 2 U.S. Government Defendant | <input type="checkbox"/> 4 Diversity<br>(Indicate Citizenship of Parties in Item III) |

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

Citizen of This State	PTF	DEF	Incorporated or Principal Place of Business In This State	PTF	DEF
<input type="checkbox"/> 1	<input type="checkbox"/>	<input type="checkbox"/> 1	<input type="checkbox"/>	<input type="checkbox"/> 4	<input type="checkbox"/> 4
<input type="checkbox"/> 2	<input type="checkbox"/>	<input type="checkbox"/> 2	<input type="checkbox"/>	<input type="checkbox"/> 5	<input type="checkbox"/> 5
<input type="checkbox"/> 3	<input type="checkbox"/>	<input type="checkbox"/> 3	<input type="checkbox"/>	<input type="checkbox"/> 6	<input type="checkbox"/> 6
<input type="checkbox"/> 4	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance	<b>PERSONAL INJURY</b>	<b>PERSONAL INJURY</b>	<input type="checkbox"/> 410 Agriculture	<input type="checkbox"/> 400 State Reapportionment
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 362 Personal Injury - Med. Malpractice	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 410 Antitrust
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 365 Personal Injury - Product Liability	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 430 Banks and Banking
<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<b>PROPERTY RIGHTS</b>	<input type="checkbox"/> 450 Commerce
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 330 Federal Employers' Liability	<input type="checkbox"/> 370 Other Fraud	<input type="checkbox"/> 460 Deportation	<input type="checkbox"/> 460 Racketeer Influenced and Corrupt Organizations
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 340 Marine Liability	<input type="checkbox"/> 371 Truth in Lending	<input type="checkbox"/> 480 Consumer Credit	<input type="checkbox"/> 480 Cable/Sat TV
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans)	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 490 Selective Service	<input type="checkbox"/> 810 Securities/Commodities/ Exchange
<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 385 Property Damage	<input type="checkbox"/> 820 Copyrights	<input type="checkbox"/> 875 Customer Challenge
<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 355 Motor Vehicle Product Liability	<input type="checkbox"/> 390 Other Personal Injury	<input type="checkbox"/> 830 Patent	<input type="checkbox"/> 12 USC 3410
<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 400 Trademark	<input type="checkbox"/> 840 RSI (405(g))	<input checked="" type="checkbox"/> 890 Other Statutory Actions
<input type="checkbox"/> 195 Contract Product Liability			<b>SOCIAL SECURITY</b>	<input type="checkbox"/> 891 Agricultural Acts
<input type="checkbox"/> 196 Franchise			<input type="checkbox"/> 710 Fair Labor Standards Act	<input type="checkbox"/> 892 Economic Stabilization Act
<b>REAL PROPERTY</b>	<b>CIVIL RIGHTS</b>	<b>PRISONER PETITIONS</b>	<input type="checkbox"/> 720 Labor/Mgmt. Relations	<input type="checkbox"/> 893 Environmental Matters
<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 510 Motions to Vacate Sentence	<input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act	<input type="checkbox"/> 894 Energy Allocation Act
<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 442 Employment	<b>Habeas Corpus:</b>	<input type="checkbox"/> 740 Railway Labor Act	<input type="checkbox"/> 895 Freedom of Information Act
<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 443 Housing/ Accommodations	<input type="checkbox"/> 530 General	<input type="checkbox"/> 790 Other Labor Litigation	<input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice
<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 444 Welfare	<input type="checkbox"/> 535 Death Penalty	<input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="checkbox"/> 950 Constitutionality of State Statutes
<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 445 Amer. w/Disabilities - Employment	<input type="checkbox"/> 540 Mandamus & Other	<b>IMMIGRATION</b>	
<input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 446 Amer. w/Disabilities - Other	<input type="checkbox"/> 550 Civil Rights	<input type="checkbox"/> 462 Naturalization Application	
	<input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 463 Habeas Corpus - Alien Detainee	
			<input type="checkbox"/> 465 Other Immigration Actions	
			<b>FEDERAL TAX SUITS</b>	
			<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)	
			<input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	

**V. ORIGIN**

(Place an "X" in One Box Only)

- |   |   |  |   |  |   |  |
|---|---|--|---|--|---|--|
| <input checked="" type="checkbox"/> 1 Original Proceeding | <input type="checkbox"/> 2 Removed from State Court | <input type="checkbox"/> 3 Remanded from Appellate Court | <input type="checkbox"/> 4 Reinstated or Reopened | <input type="checkbox"/> 5 Transferred from another district (specify) _____ | <input type="checkbox"/> 6 Multidistrict Litigation | <input type="checkbox"/> 7 Appeal to District Judge from Magistrate Judgment |
|---|---|--|---|--|---|--|

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
**15 U.S.C. § 1692 et seq.****VI. CAUSE OF ACTION**

Brief description of cause:

**Unfair Debt Collection Practices****VII. REQUESTED IN COMPLAINT:**

CHECK IF THIS IS A CLASS ACTION  
 UNDER F.R.C.P. 23

DEMAND \$ 75,001.00

CHECK YES only if demanded in complaint:  
**JURY DEMAND:**  Yes  No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

09/07/11

/s/Abbas Kazerounian, Esq.

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

## INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

### Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

**I. (a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.

(b) County of Residence. For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)

(c) Attorneys. Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".

**II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.C.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.

United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.

United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.

Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.

Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; federal question actions take precedence over diversity cases.)

**III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.

**IV. Nature of Suit.** Place an "X" in the appropriate box. If the nature of suit cannot be determined, be sure the cause of action, in Section VI below, is sufficient to enable the deputy clerk or the statistical clerks in the Administrative Office to determine the nature of suit. If the cause fits more than one nature of suit, select the most definitive.

**V. Origin.** Place an "X" in one of the seven boxes.

Original Proceedings. (1) Cases which originate in the United States district courts.

Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.

Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.

Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.

Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.

Multidistrict Litigation. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407. When this box is checked, do not check (5) above.

Appeal to District Judge from Magistrate Judgment. (7) Check this box for an appeal from a magistrate judge's decision.

**VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service

**VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.

Demand. In this space enter the dollar amount (in thousands of dollars) being demanded or indicate other demand such as a preliminary injunction.

Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.

**VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

**Date and Attorney Signature.** Date and sign the civil cover sheet.